

REMARKS

Reconsideration and allowance are respectfully requested.

Original claims 1, 2, 3, and 8, cancelled in the previous Response are being added as claims 12-15. No new matter has been added. Entry and allowance are requested.

Claims 4-7, 9, and 10 are patentable under 35 U.S.C. 103(a) over Goldberg (US Patent 6,389,038) and Dalton (US Patent 6,236,653).

Goldberg method only applies to uncompressed voice and does not include the concept of the micro header. There is no motivation, teaching or suggestion to add this micro header to the Goldberg frame structure. The micro header allows for different types of data to be multiplexed (voice, fax, G729, G723.1 ... etc.) which adds considerable scope to the claimed invention and is absent in Goldberg, which cannot therefore render the claimed invention obvious.

Dalton relates to a device for voice over DSL in a point to point situation. There is no multiplexing so it has nothing to do with the claimed invention.

Goldberg assumes that all packets in the superframe have the same length (no micro header) while NOP does not assume this. Therefore different types of traffic can be multiplexed with NOP but not with the Goldberg method.

The Examiner's observation that "One of the ordinary skill in the art would have been motivated to do this in order to conserve bandwidth" is not well taken, as there is no

substantiating evidence of such teaching or suggestion within the references. The claimed invention is unique and non-obvious because compression supposes different packet sizes and types (silence, G723.1, G729, Fax ... etc.).

Claim 11 is patentable over Goldberg, Dalton and Chuah (US Patent 6,408,001).

As pointed out above, Goldberg and Dalton teach away from the claimed invention. Therefore, any further combination with other references will also lead away from the present claims.

Chuah is only a router to router IP header removal technique by label assignment and therefore it is not multiplexing like NOP. It requires all routers to co operate which is not required with NOP. The 3-bytes header referred to in the Chuah method is not a micro NOP header but just one application of what a VoIP application could generate for its own purpose. These 3-bytes are not used in the Chuah method which only deals with the IP header.

Van Hammerstein describes a method of multiplexing multiple DLCT. The purpose is to save DLCT and not to save bandwidth. In fact the bandwidth is increased.

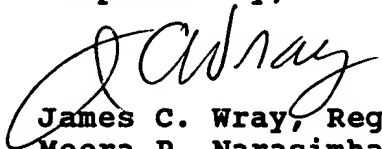
Carew does not describe multiplexing of packets into a bigger packet but multiplexing of packets into a line. Therefore saving by header removal is not the purpose.

The present invention, NOP, is an innovative use of voice compression packet bundling and switching technique which is not taught, suggested or inherently provided by the references of

record. Even Goldberg does not teach nor suggest adding a micro header inside the superframe to split the payload in a more generic way rendering the present claims patentable over the references.

Since Applicant has presented a novel, unique and non-obvious invention, reconsideration and allowance are respectfully requested.

Respectfully,



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August 25, 2003